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August 12, 2021

VIA ELECTRONIC COURT FILING

Honorable William J. Martini, U.S.D.J.
Honorable Mark Falk, Chief U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

RE: ***McNair et al., v. State of New Jersey, et al.***
Civil Action No. 21-1291 (WJM)(MF)

Dear Judge Martini and Judge Falk:

We represent defendant Benny Perez in the above-referenced matter. On August 11, 2021, defendants State of New Jersey, New Jersey Department of Corrections, Special Treatment Unit, Adult Diagnostic Treatment Center, Marcus Hicks, Acting Commissioner Victoria Kuhn, and New Jersey Department of Health (the “State Defendants”), filed a motion to strike paragraphs 182 – 205 from the First Amended Complaint, pursuant to Fed.R.Civ.P. 12(f).

Defendant Perez joins in the State Defendants’ Motion to Strike, and for the same reasons set forth therein, and respectfully requests that it be granted.

Respectfully submitted,

MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

s/ John J. Peirano

JOHN J. PEIRANO

JJP/jtt

cc: All Counsel of Record (via ECF)